



# pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

SECRETARY

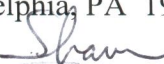
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DEC 02 2015

Division Director (3AP00)

November 18, 2015

Mr. Shawn M. Garvin  
Regional Administrator  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street (Mail Code: 3RA00)  
Philadelphia, PA 19103-2029

  
Dear Mr. Garvin:

I am writing to withdraw the Allegheny County Health Department's (ACHD) State Implementation Plan revision for its "Coke Oven and Coke Oven Gas – Soaking" regulation. The SIP revision pertains to ACHD's Rules and Regulations, Article XXI, Air Pollution Control, incorporating the "Coke Oven and Coke Oven Gas – Soaking" regulation in Section 2105.21.i and a related definition in Section 2101.20. The ACHD has identified this SIP revision as "SIP Revision 76" for internal tracking purposes (See enclosure).

The Pennsylvania Department of Environmental Protection (DEP) submitted the SIP revision, on behalf of the ACHD, to the U.S. Environmental Protection Agency (EPA) for approval on July 16, 2014. Subsequently, the EPA indicated that ACHD's "Coke Oven and Coke Oven Gas – Soaking" regulation provides an exemption during "start-up" which is contrary to EPA's policy in regard to excess emissions during start-up, shutdown and malfunction periods. Therefore, by letter dated October 8, 2015, the ACHD requested that DEP withdraw the SIP revision (See enclosure).

Thank you for your consideration of my request. Should you have questions or need additional information, please contact Joyce E. Epps, Director, Bureau of Air Quality, by e-mail at [jeepps@pa.gov](mailto:jeepps@pa.gov) or by telephone at 717.787.9702. You may also contact Jayme Graham, ACHD's Air Director, by e-mail at [jgraham@achd.net](mailto:jgraham@achd.net) or by telephone at 412.578.8129.

Sincerely,



John Quigley  
Secretary

Enclosure

cc: Joyce Epps  
Jayme Graham, ACHD

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Rachel Carson State Office Building | P.O. Box 2063 | Harrisburg, PA 17105-2063

717.787.2814

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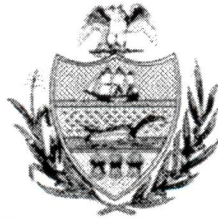
[www.dep.pa.gov](http://www.dep.pa.gov)

Mr. Shawn M. Garvin

- 2 -

bcc: Kirit Dalal  
Steve Hepler  
Nancy Herb  
Jim Kelly, ACHD  
Tom Lattner, ACHD

COUNTY OF



ALLEGHENY

RICH FITZGERALD  
COUNTY EXECUTIVE

October 8, 2015

Ms. Joyce Epps, Director  
Department of Environmental Protection  
Bureau of Air Quality  
Rachel Carson Building  
400 Market Street, P.O. Box 8468  
Harrisburg, PA 17105-8468

RE: Withdrawal of soaking emissions regulation SIP76

Dear Ms. Epps:

With this letter, the Allegheny County Health Department (ACHD) is requesting that the Pennsylvania Department of Environmental Protection (PA DEP) withdraw the State Implementation Plan (SIP) revisions for the ACHD's "Coke Oven and Coke Oven Gas – Soaking" regulation (identified as SIP revision 76).

On July 16, 2014, PA DEP, on behalf of the ACHD, submitted to U.S. EPA Region III a revision to the SIP pertaining to amendments to the ACHD Rules and Regulations, Article XXI, Air Pollution Control, incorporating regulations for Coke Ovens and Coke Oven Gas in §2105.21.i (below) and a related definition in §2101.20.

**§2105.21 COKE OVENS AND COKE OVEN GAS**

- i. **Soaking.** At no time shall soaking emissions from a standpipe cap opening exceed twenty percent (20%) opacity. An exclusion from this opacity limit shall be allowed for two (2) minutes after a standpipe cap is opened. Compliance with this standard shall be determined through observing the standpipe from a position where the observer can note the time the oven is dampered off and, following the two minute exclusion, read the soaking emissions from the open standpipe in accordance with Method 9.

However, EPA has recently indicated that that this regulation cannot be approved because EPA considers this to be an exemption during start-up and to be contrary to its position on enforcement of emissions from start-up, shutdown, malfunction as described in the June 12, 2015 final action, *"Restatement and Update of EPA's SSM Policy Applicable to SIPs; Findings of Substantial Inadequacy; and SIP Calls To Amend Provisions Applying to Excess Emissions During Periods of Startup, Shutdown and Malfunction"* (80FR33840).



KAREN HACKER, MD, MPH, DIRECTOR  
ALLEGHENY COUNTY HEALTH DEPARTMENT  
AIR QUALITY PROGRAM

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Request for Withdrawal of Soaking Regulation - SIP76

October 8, 2015

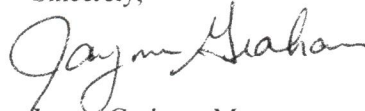
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To address EPA's concern, we are requesting that you seek the Secretary's concurrence and signature in a letter to the EPA Region III Administrator which withdraws the SIP Revision 76 in its entirety.

While making this request, ACHD will, however, preserve the coke oven soaking regulations and related definition as local regulations.

We request that PA DEP approve this request for withdrawal and forward it to the U.S. EPA Region III Administrator with a recommendation for approval. If you have any questions, please call me at (412) 578-8103 or email me at [jgraham@achd.net](mailto:jgraham@achd.net).

Sincerely,

A handwritten signature in black ink, appearing to read "Jayme Graham". The signature is fluid and cursive, with the first name "Jayme" and last name "Graham" clearly distinguishable.

Jayme Graham, Manager  
Air Quality Program

cc: Kirit Dalal  
Stephen Hepler